
Exhibit 8



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**Re: *Miller, et al. v. Arab Bank, PLC*, No. 18-cv-2192 (HG)(PK)
 Pam, et al. v. Arab Bank, PLC, No. 18-cv-4670 (HG)(PK)**

Dear Brett,

Plaintiffs write in response to your April 29 suggestion that we engage in a search term process to identify Arab Bank's relevant ESI. While we appreciate your willingness to meet and confer on this issue, we are advised that proceeding by developing search terms or SQL queries without additional information and context would potentially lead to incomplete or inaccurate search results. Therefore, as set forth in more detail below, we request that Arab Bank provide the key system details for each dataset you have listed before we move forward with proposing or negotiating any search methodologies.

As you may know, the Sedona Conference Database Principles ("Sedona Principles") underscore the importance of discussing system architecture, relevant fields, accessibility, data formatting, and intended use of data when assessing information from databases in civil litigation.¹ The Sedona Principles also note that due to differences in database structures and query languages, parties must understand the purpose and context of the information sought and the workings of the relevant systems to develop effective and comprehensive searches. As a simple analogy, one cannot expect to get consistent results by running the same search in Google as in Lexis or Westlaw, as each platform has its own architecture and syntax. This is even more true for the proprietary Oracle and IBM DB2 relational databases Arab Bank uses in, among other systems, its Equation CORE banking system, SWIFT Alliance Access financial messaging system, and Enterprise Content Management System.

Without information on how Arab Bank's database systems are organized, what data they hold, and how searches can be constructed, we would be "flying blind" in trying to propose search terms, SQL queries or other approaches to identifying relevant information.

Thus, consistent with the Sedona Principles, in our view, a meaningful collaboration on developing search terms or SQL queries requires that Plaintiffs gain a foundational understanding of Arab Bank's database systems before attempting to craft meaningful search parameters. As

¹ See, The Sedona Conference, *Database Principles: Addressing the Preservation and Production of Databases and Database Information on Civil Litigation*, 15 SEDONA CONF. J. 171 (2014), https://thesedonaconference.org/sites/default/files/publications/171-216%20Database%20Principles_0.pdf.

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previously requested, key information Plaintiffs would need is details on the structure and content of Arab Bank's relevant databases, including but not limited to:

- A list or catalog of all tables contained in each database.
- The names, data types, and descriptions of fields contained in each table.
- Any coded values, abbreviations, or special formats used in key fields.
- Entity relationship diagrams or other documentation showing how tables and fields are linked.

While data dictionaries, schemas, and entity relationship diagrams are often the most clear and concise way to convey this foundational information, we are certainly open to discussing alternative methods Arab Bank might prefer. Our goal is to obtain the core details needed to understand what information the Bank's databases contain, how it is organized, and how tables and fields relate, as this knowledge is essential for developing accurate and complete search parameters and database queries.

Furthermore, a key threshold issue we must resolve is whether Arab Bank's ESI will be searched in its original native systems or exported to either a new database or a separate review platform like Relativity. The answer to this question has significant implications for nearly every aspect of the search process, including:

- *Data format and structure*: Depending on the export method and target review platform, the native data format, metadata fields, and document organization may be altered in material ways. We would need to understand any such impacts to ensure searches remain accurate and complete.
- *Search capabilities and syntax*: The available search tools, options and syntax can vary widely between native databases and review platforms. We would need to know the specific query language, Boolean operators, proximity functions, wildcard usage and any other search features or limitations in the chosen environment.
- *Scope of searchable content*: The fields and document sections available for searching may differ between native systems and review platforms. For example, some metadata fields present in the native source may not be populated upon export. Alternatively, indexing techniques used by review platforms might allow new fields to be searched that are not searchable in the native format. Clear communication is needed to define exactly what content is and is not searchable.
- *Search validation*: Quality control measures to validate the accuracy and completeness of searches can differ significantly between native systems and review platforms. We would need to discuss appropriate sampling, reporting, and verification protocols based on the chosen search environment.

Without knowing whether you intend to search a particular database using native or exported searches, we cannot intelligently design and propose any search terms, queries, or

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parameters. As discussed above, if Arab Bank intends to search native databases, we will need to understand the query language, searchable fields, and any limitations. If some type of new database or review platform will be used for a given database, we will need to know the product name and version, details on how the data will be exported and processed, and the resulting impact on searchable content and query syntax. Only with this information can we be confident that searches will be properly calibrated for the ESI at issue.

We therefore request that Arab Bank provide the key system details for each dataset you have listed before we move forward with proposing or negotiating any search methodologies. We are happy to elaborate on the specific information needed and address any concerns you may have. Our shared goal is to gain the information necessary to craft efficient, targeted searches that will accurately capture the relevant ESI in this matter.

We would like to schedule a call early next week to discuss this further and hope we can work collaboratively to develop an effective e-discovery protocol for searching Arab Bank's ESI in Gaza, the West Bank, Jordan, Lebanon, and New York.

Sincerely,

/s/ Gary M. Osen

cc: All Counsel